



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

August 7, 2014

Mr. Matt McClincy
Oregon Department of Environmental Quality
Northwest Region Office
2020 SW 4th Avenue, Suite 400
Portland, Oregon 97201

RE: EPA Review of DEQ Recommended Alternative for LNAPL and Groundwater Source Control
Premier Edible Oils Site, ECSI #2013 (July 2014)

Dear Mr. McClincy:

The Environmental Protection Agency (EPA) has completed its review of the subject report. We have attached for your consideration and use our review comments.

EPA's review has led to recommendations for some limited additional information and clarifications recommended within the document as well as an update on preliminary remediation goals being established for the Portland Harbor Superfund Site. We are available to discuss any issues raised from this review.

Please feel free to contact me at 503-326-6554 or muza.richard@epa.gov regarding any questions that you might have on EPA's review of the DEQ Recommended Alternative for LNAPL and Groundwater at the Premier Edible Oils Site.

Sincerely,

Rich Muza
Remedial Project Manager

Enclosure

Comments on the DEQ Recommended Alternative for LNAPL and Groundwater Source Control Premier Edible Oils Site (ECSI #2013)

1. Project Background – What is the definition of “edible oil” as used in the context of former PEO operations? It is recommended that any information on the product(s) and any potential contaminants from operations over the years that the facility was active be added within this section.
2. DEQ Remedial Action Objectives for Source Control Contaminants of Concern – “DEQ shared the groundwater source RAOs for PEO with Rich Muza of the U.S. Environmental Protection Agency (EPA) Region 10, Oregon Operations Office in accordance with DEQ’s Portland Harbor Joint Source Control Strategy Memorandum of Understanding.” It is recommended that this statement be edited to state that “DEQ shared the groundwater source RAOs for PEO with EPA in accordance...”
3. DEQ Remedial Action Objectives for Source Control Contaminants of Concern – Since EPA comments were sent to DEQ on the proposed RAOs and as noted in this section of the document, in its on-going work on the Portland Harbor Superfund Site EPA has established the following PRGs, pending finalization in the Portland Harbor Feasibility Study Report:

TPH (C10-C12)	2.6 ppb	porewater
Benzene	5 ppb 130 ppb	drinking water porewater
Ethylbenzene	700 ppb 7.3 ppb	drinking water surface water & porewater
Xylenes	10,000 ppb 13 ppb	drinking water porewater
Arsenic	10 ppb 190 ppb	drinking water surface water
Manganese	320 ppb 120 ppb	drinking water porewater

Please note that these PRGs would supersede the proposed RAOs in the EPA letter cited in the report; however, the point of compliances identified in that EPA letter would still be deemed appropriate for future remedy assessment.

4. PEO Southern Portion Groundwater and LNAPL Source Control - RI/FS – It is recommended that a map showing either 1) a compilation of groundwater monitoring results with time or 2) at a minimum, the most recent groundwater monitoring data be provided as an additional figure to the document. This figure would provide support for the technical findings presented in this section. Also, any reference documents used to draw information here should be cited in support of this discussion.
5. PEO Southern Portion Groundwater Source Control FS Evaluations – “Additional treatment measures are being considered as part of the pre-design or can be implemented after a few years of monitoring if it does not perform as expected (see below).” No follow up information on additional treatment measures is provided in the discussion within the section titled “Proposed Groundwater Source Control Action” (ie., the “see below” section).